

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Review of the Commission's )  
Regulations Governing )  
Programming Practices of )  
Broadcast Television Networks )  
and Affiliates )

MM Docket No. 95-92

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TO: The Commission

**MOTION OF THE NETWORK AFFILIATED STATIONS ALLIANCE  
FOR AN EXTENSION OF TIME TO FILE COMMENTS**

The Network Affiliated Stations Alliance ("NASA"), a coalition of the affiliate associations of the ABC, CBS and NBC television networks representing more than 600 television broadcast stations across the United States, hereby requests that the Commission extend the time in which comments may be filed in the above-captioned proceeding from August 28, 1995 until October 27, 1995 and for the reply comment date to be extended accordingly. We are authorized to represent to the Commission that the ABC, CBS and NBC television networks do not oppose the extension proposed by this request.

As the notice of proposed rule making ("NPRM") in this docket acknowledges, the five rules that are being considered for repeal or modification in this docket have been an integral part of the network-affiliate relationship for decades. These rules have a unique and pervasive impact on each of the hundreds of stations affiliated with the major networks. The proposals in the NPRM for repealing or

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modifying the network-affiliate rules go to the heart of the relationship between affiliates and their networks.

The issues posed by the NPRM may require for their resolution the submission of empirical evidence concerning the network-affiliate relationship. A comprehensive response to these issues also may require substantial economic analysis. NASA has been in the process of assessing whether economic evidence should be submitted in response to the NPRM and is actively interviewing economists for the preparation of any report that may be necessary. It would be impossible for NASA to collect and submit either the empirical evidence that likely will be required or the economic evidence that may be required by the current due date of August 28, 1995.

It is unquestionably in the public interest for comments in this proceeding to be as comprehensive as possible and be based not only on argument but on empirical and, to the extent appropriate, economic evidence concerning the network-affiliate relationship. The proposed extension request will permit comments that are most helpful to the Commission to be submitted.

Given the length of time these rules have been a crucial part of the broadcasting landscape and the breadth of the proposals in the NPRM, an extension of 60 days for initial comments is reasonable and appropriate. This extension would be less than that granted for analogous reasons in the docket assessing the prime-time access rule, in which extensions of

more than 60 days were appropriately and properly granted to permit full assessment of economic evidence concerning the issues underlying that rule.

NASA thus respectfully requests that the Commission extend the due date for reply comments in this proceeding through and including October 27, 1995 and adjust the due date for reply comments accordingly.

Respectfully submitted,

THE NETWORK AFFILIATED  
STATIONS ALLIANCE

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